

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., et al.,  
  
Debtors.

Chapter 11

Case No. 24-12480 (JTD)  
(Jointly Administered)

Hearing Date: December 10, 2024 at 10:00 a.m. ET  
Objection Deadline: December 3, 2024 at 4:00 p.m. ET

**Related D.I. 194**

**NOTICE OF MOTION OF THE AD HOC GROUP OF FREEDOM LENDERS FOR  
ENTRY OF AN ORDER (I) ADJOURNING THE SECOND DAY HEARING SET  
FOR DECEMBER 10, 2024, (II) EXTENDING THE OBJECTION DEADLINES IN  
CONNECTION WITH THE SECOND DAY HEARING  
AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that the Ad Hoc Group of Freedom Lenders (the “Freedom Lender Group”) filed the *Motion for Entry of an Order (I) Adjourning the Second Day Hearing Set for December 10, 2024, (II) Extending the Objection Deadlines in Connection with the Second Day Hearing and (III) Granting Related Relief* (the “Motion”)<sup>1</sup> with the United States Bankruptcy Court for the District of Delaware (the “Court”) seeking entry of an order requesting various relief, as set forth more fully in the Motion. **YOUR RIGHTS MAY BE AFFECTED BY THIS MOTION.** Accordingly, you should read this notice and the Motion.

**PLEASE TAKE FURTHER NOTICE** that any objection to the Motion must be filed on or before **December 3, 2024, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the undersigned counsel so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Motion will be

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

held on **December 10, 2024 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable John T. Dorsey in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE that the Court may grant the relief requested in the Motion without further notice or a hearing if you fail to respond to the Motion in accordance with this notice.** Copies of the Motion and other filings in this chapter 11 case can accessed for free at <https://cases.ra.kroll.com/FRG/>.

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Dated: November 22, 2024

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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